

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

City of Rochester v. Purdue Pharma, L.P.,
No. 19-op-45853 (Track 12)

Lincoln County v. Richard S. Sackler, M.D.,
No. 20-op-45069 (Track 13)

City of Independence, Missouri v. Williams,
No. 19-op-45371 (Track 14)

*County of Webb, Texas v. Purdue Pharma,
L.P.*, No. 18-op-45175 (Track 15)

MDL NO. 2804

Case No. 17-MD-2804

Judge Dan Aaron Polster

DECLARATION OF JONATHAN G. COOPER

I, Jonathan G. Cooper, declare as follows:

1. I am an attorney at Quinn Emanuel Urquhart & Sullivan, LLP. I represent Express Scripts, Inc., Evernorth Health, Inc., Express Scripts Administrators, LLC, Medco Health Solutions, Inc., ESI Mail Order Processing, Inc., ESI Mail Pharmacy Service, Inc., Express Scripts Pharmacy, Inc., and Express Scripts Specialty Distribution Services, Inc., in this litigation. I have personal knowledge of the matters stated herein; and, if called upon, I could and would competently testify thereto.

2. A true and correct copy of all Plaintiffs' Dispensing and Pharmacy Practice Discovery Requests to Pharmacy Benefit Manager Defendants, dated April 16, 2024, is attached hereto as **Exhibit A**.

3. A true and correct copy of all Plaintiffs' Combined Discovery Requests to Defendant Pharmacy Benefit Managers (1st Set), dated December 29, 2023, is attached hereto as **Exhibit B**.

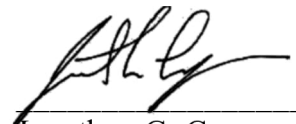
4. A true and correct copy of Track 12 & 13 Plaintiffs' National Data Requests, dated February 6, 2024, is attached hereto as **Exhibit C**.

5. A true and correct copy of all Plaintiffs' Geographic Specific Data Requests, dated February 6, 2024, is attached hereto as **Exhibit D**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 16, 2024

Respectfully submitted,


Jonathan G. Cooper